

THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	
vs.	)	
	)	No. 4:19-CR-572 RWS
ANGELA WILLIAMS,	)	
	)	
Defendant.	)	

**DEFENDANT’S SENTENCING MEMORANDUM AND REQUEST FOR A  
NONCUSTODIAL SENTENCE**

Dr. Angela Williams is currently employed full-time as a medical consultant in accordance with her bond conditions. She is participating in a voluntary treatment program called the Missouri Physician’s Health Program. She joined this program voluntarily in November of 2019 and plans to remain enrolled for four years. She is also considering furthering her education with a scholarship to go to business school at night while she continues to work to support herself and her daughter.

She is sober and she is caring for her young daughter financially, physically, and emotionally. While she had a rocky start on her bond, she has adjusted her routine and found a balance that allows her to support her daughter, stay sober, and comply with her obligations to the Court. Her sobriety and her new job have encouraged her to reassess the type of practice and career she wants. She understands how important her sobriety is to achieving all of her other goals, and she further understands how self-care

and stress management will assist her in maintaining her sobriety. With the assistance of the United States Probation Office, Dr. Williams will continue to improve her life and support her daughter's wellbeing.

WHEREFORE, she respectfully asks the Court to consider a sentence that will allow her to remain on her path to successful rehabilitation while deterring any further criminal conduct.

Respectfully submitted,

/s/Brocca Morrison  
BROCCA MORRISON  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 16th day of October, 2020, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mr. Andrew Lay, the Assistant United States Attorney.

/s/Brocca Morrison  
BROCCA MORRISON  
Assistant Federal Public Defender